

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ADELA BAI, on behalf of itself and all others similarly situated)	No. 1:16-cv-00102
)	
)	<u>CLASS ACTION</u>
Plaintiffs,)	
)	
vs.)	
)	Judge Donald C. Nugent
TCP INTERNATIONAL HOLDINGS LTD.,)	
KAREL ROBERT DEN DAAS, ELLIS YAN,)	MOTION FOR ADMISSION OF GAIL L.
and BRIAN CATLETT,)	ELLIS <i>PRO HAC VICE</i>.
)	
Defendants.)	
)	
)	
_____)	

Pursuant to Local Rule 85.3(h) and the attached affidavit, Daniel R. Warren, attorney for defendants TCP International Holdings Ltd., Karel Robert den Daas, and Brian Catlett, moves this Court to admit Gail L. Ellis *pro hac vice* to appear and participate as counsel in this case for defendants TCP International Holdings Ltd., Karel Robert den Daas, and Brian Catlett.

Ms. Ellis is a member in good standing of the highest court of the State of Illinois, effective November 6, 2014. Ms. Ellis is also a member in good standing of the bars of the United States Court of Appeals for the Seventh Circuit, the United States District Court for the Northern District of Illinois, and the State of New York. Ms. Ellis has never been disbarred or suspended from the practice of law or received any reprimand from any court pertaining to conduct or fitness as a member of the bar. Attached as Exhibit A is a sworn affidavit attesting to Ms. Ellis's good standing.

The required admission fee of \$120 is being paid via credit card. Ms. Ellis will register for electronic filing with this Court upon the granting of this Motion.

Ms. Ellis's relevant identifying information is as follows:

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Dated: January 22, 2016

Respectfully submitted,

/s/ Daniel R. Warren
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*Counsel for Defendants TCP
International Ltd., Karel Robert den
Daas, and Brian Catlett*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of January, 2016, a copy of the foregoing filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Daniel R. Warren

Attorney for Defendants TCP
International Holdings Ltd.,
Karel Robert den Daas, and
Brian Catlett